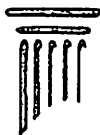


EXHIBIT “K”



E. STEWART

Jones Hacker Murphy LLP

ATTORNEYS & COUNSELORS AT LAW

Please send all mail to:
TROY OFFICE

28 SECOND STREET
TROY, NY 12180
PHONE: (518) 274-5820

200 HARBORSIDE DRIVE, SUITE 300
SCHENECTADY, NY 12305
PHONE: (518) 783-3843

511 BROADWAY
SARATOGA SPRINGS, NY 12866
PHONE: (518) 584-8886

1659 CENTRAL AVENUE, SUITE 103
ALBANY, NY 12205
PHONE: (518) 486-8800

August 10, 2021

VIA U.S. MAIL & E-MAIL TO:

chet@chetminingco.com

Chet Stojanovich

105 Duane Street, Apt. 20F

New York, New York 10007

RE: Alex Holmes, et al. v. Chet Stojanovich, et al. Case No.: 7:20cv04448 and
Andrew Schwartzberg v. Chet Stjanovich, et al. Case No.: 1:20cv01880 FAX: (518) 274-5875

Dear Chet:

www.joneshacker.com

Enclosed please find hard copies of the subpoenas that were served upon your relatives.

The continuation of your deposition is scheduled for September 2, 2021 at 2:00 P.M. (EST) via Zoom conferencing. The link for the Zoom deposition is as follows:

<https://us02web.zoom.us/j/85307125991?pwd=eEJwSTNFQ2hULzhtakJsOWw1S2ZHU09>

Meeting ID: 853 0712 5991

Passcode: 929145

Please be advised that if you fail to appear at this deposition, we will make a motion to hold you in contempt of Court.

Please provide my offices with electronic copies of documents in your possession, custody or control at least 2 days before the date for your deposition along with your log in information for your I-Cloud accounts for the documents requested by the subpoena. I have also enclosed an additional copy of the documents requested for your convenience.

Very truly yours,

E. STEWART JONES HACKER MURPHY LLP

/s/ John F. Harwick

John F. Harwick, Esq.

jharwick@joneshacker.com

Direct Dial: (518) 213-0113

JFH:dmd

Enclosure

cc: Clients

Exhibit A

Produce the following items relating to Chet Mining Co., LLC, Chet Mining Co Canada

LTD and Chet Stojanovich (collectively the “Debtors”) for the past six (6) years:

1. All documents showing loans to others;
2. General ledger and checkbooks;
3. Federal and State Income Tax Returns, including all schedules and amendments;
4. Bank account statements (e.g., cash accounts, checking accounts, savings accounts);
5. Certificates of deposit;
6. Balance sheets;
7. A list of assets and/or inventory owned or leased ;
8. Any documents showing monies owed to the Debtors;
9. A list of all accounts receivable, with the debtor’s addresses;
10. Documents showing any transactions with insiders (e.g. employees, shareholders, members, owners, officers or directors of the Debtors);
11. Financial statements;
12. Deeds to any and all real property owned or controlled;
13. Documents showing ownership, leasing or control of any real property, equipment, boat, aircraft or vehicles;
14. Appraisals of any real or personal property owned;
15. Loan and/or line of credit applications;
16. All audited or unaudited financial statements and disclosures;
17. Audit reports;
18. UCC filings and financing statutes;
19. Payroll account records;
20. Shareholder agreements;
21. Operating agreements of any LLC owned or operated by Debtors;
22. LLC or Corporate minutes, books and records;
23. Insurance policies;
24. Titles to any and all vehicles, boats, aircrafts and/or equipment;
25. Wills;
26. Trusts where the Debtors are beneficiaries or grantors;
27. Retirement account statements;
28. Investment accounts statements;
29. Securities certificates;
30. Stock options;
31. Commodity account statements;
32. Broker margin account statements;
33. Written itemization of all cash and crypto currency held by or on behalf of the Debtors;
34. Safe deposit box records and the contents of safe deposit boxes;
35. Credit card statements and applications;
36. Loan applications;

37. Mortgages, mortgage statements and applications;
38. Loan and line of credit documents and written statements;
39. A statement of net worth;
40. Divorce proceeding records;
41. Contingent interests (*e.g.*, stock options, interests subject to life estates, prospective inheritances);
42. Tax shelter investment records;
43. Debt collection records;
44. Judgments;
45. Pleadings in all lawsuits where the Debtor is a party;
46. Arbitration papers and awards where the Debtor is a party;
47. Documents showing ownership of patents;
48. Documents showing ownership of trademarks;
49. Documents showing ownership of copyrights;
50. Documents showing ownership of intellectual property;
51. Any evidence of gifts to others;
52. All cryptocurrency records/statements;
53. Software and hardware wallets;
54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

AO 88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of New York

ALEX HOLMES, ET AL.

Plaintiff

v.

CHET MINING CO, LLC, CHET MINING CO
CANADA LTD and CHET STOJANOVICH

Defendant

Civil Action No. 20-CV-0448-UA

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Paul John Stojanovich
450 N. End Avenue, Apt. 18F, New York NY 10282
(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

| | |
|--|--|
| Place: https://us04web.zoom.us/j/72278172346? pwd=aTVYTCl6Yk1aeE14N0xneTFhMFFpQT09 Meeting ID: 722 7817 2346 Passcode: BfUAe1 | Date and Time: Adjourned to 09/16/2021 10:00 am |
|--|--|

The deposition will be recorded by this method: Stenographer and video

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit "A" attached hereto. Kindly provide all documents requested, via e-mail to jharwick@joneshacker.com or by U.S. mail to 200 Harborside Drive, Suite 300, Schenectady, NY 12305.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/21/2021

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) John F. Harwick, Representing all Plaintiffs, who issues or requests this subpoena, are:

John F. Harwick, Esq., E. Stewart Jones Hacker Murphy LLP, 200 Harborside Drive, Suite 300, Schenectady NY 12305, (518) 213-0113 jharwick@joneshacker.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX HOLMES, JOSH NAVARRO, NICO
TRAMONTANA, BITCOIN VENTURES 2020, LLC,
YASAR CORPORATION and ONEPURPOSE LTD.,
Plaintiffs,

RESTRAINING NOTICE

against-

Civil Case No.: 1:20-CV-04448

CHET MINING CO, LLC, CHET MINING CO
CANANDA LTD., and CHET STOJANOVICH,

Defendants.

WHEREAS, no previous restraining notice has been served upon you pursuant to CPLR Article 52.

WHEREAS, it appears that you owe a debt to the plaintiff/judgment creditor or are in possession or in custody of property in which the judgment debtors have an interest.

PLEASE TAKE NOTICE that pursuant to subdivision (b) of Section 5222 of the Civil Practice Law and Rules, which is set forth in full herein, you are hereby forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property or pay over or otherwise dispose of any such debt except as therein provided.

PLEASE TAKE FURTHER NOTICE that this notice also covers all property in which the judgment debtors have an interest hereafter coming into your possession or custody, and all debts hereafter coming due from you to the judgment debtors.

CIVIL PRACTICE LAW AND RULES SECTION 5222(b)

Effect of restraint; prohibition of transfer; duration. A judgment debtor served with a restraining notice is forbidden to make or suffer any sale, assignment, transfer or interference with any property in which he has an interest, except upon direction of the sheriff or pursuant to an order of the court, until the judgment is satisfied or vacated. A restraining notice served upon a person other than the judgment debtor is effective only if, at the time of service, he owes a debt to the judgment debtor or he is in the possession or custody of property in which he knows or has reason to believe the judgment debtor has an interest, or if the judgment creditor has stated in the notice that a specified debt is owed by the person served to the judgment debtor or that the judgment debtor has an interest in specified property in the possession or custody of the person served. All property in which the judgment debtor is known or believed to have an

interest then in and thereafter coming into the possession or custody of such a person, including any specified in the notice, and all debts of such a person, including any specified in the notice, then due and thereafter coming due to the judgment debtor, shall be subject to the notice. Such a person is forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to an order of the court, until the expiration of one year after the notice is served upon him, or until the judgment is satisfied or vacated, whichever event first occurs. A judgment creditor who has specified personal property or debt in a restraining notice shall be liable to the owner of the property or the person to whom the debt is owed, if other than the judgment debtor, for any damage sustained by reason of the restraint. If a garnishee served with a restraining notice withholds the payment of money belonging or owed to the judgment debtor in an amount equal to twice the amount due on the judgment, the restraining notice is not effective as to other property or money.

PLEASE TAKE FURTHER NOTICE disobedience of this Restraining Notice is punishable as a contempt of Court.

E. STEWART JONES HACKER MURPHY LLP

By: s/ John F. Harwick
John F. Harwick, Esq.
Attorney for Plaintiffs/Judgement Creditors
200 Harborside Drive, Suite 300
Schenectady, New York 12305
Tel. No.: (518) 213-0113
jharwick@joneshacker.com

Exhibit A

Produce the following items relating to Chet Mining Co., LLC, Chet Mining Co Canada LTD and Chester Stojanovich (collectively the "Debtors") for the past six (6) years:

1. All documents showing loans to others;
2. General ledger and checkbooks;
3. Federal and State Income Tax Returns, including all schedules and amendments;
4. Bank account statements (e.g., cash accounts, checking accounts, savings accounts);
5. Certificates of deposit;
6. Balance sheets;
7. A list of assets and/or inventory owned or leased ;
8. Any documents showing monies owed to the Debtors;
9. A list of all accounts receivable, with the debtor's addresses;
10. Documents showing any transactions with insiders (e.g. employees, shareholders, members, owners, officers or directors of the Debtors);
11. Financial statements;
12. Deeds to any and all real property owned or controlled;
13. Documents showing ownership, leasing or control of any real property, equipment, boat, aircraft or vehicles;
14. Appraisals of any real or personal property owned;
15. Loan and/or line of credit applications;
16. All audited or unaudited financial statements and disclosures;
17. Audit reports;
18. UCC filings and financing statutes;
19. Payroll account records;
20. Shareholder agreements;
21. Operating agreements of any LLC owned or operated by Debtors;
22. LLC or Corporate minutes, books and records;
23. Insurance policies;
24. Titles to any and all vehicles, boats, aircrafts and/or equipment;
25. Wills;
26. Trusts where the Debtors are beneficiaries or grantors;
27. Retirement account statements;
28. Investment accounts statements;
29. Securities certificates;
30. Stock options;
31. Commodity account statements;
32. Broker margin account statements;
33. Written itemization of all cash and crypto currency held by or on behalf of the Debtors;
34. Safe deposit box records and the contents of safe deposit boxes;
35. Credit card statements and applications;
36. Loan applications;

37. Mortgages, mortgage statements and applications;
38. Loan and line of credit documents and written statements;
39. A statement of net worth;
40. Divorce proceeding records;
41. Contingent interests (e.g., stock options, interests subject to life estates, prospective inheritances);
42. Tax shelter investment records;
43. Debt collection records;
44. Judgments;
45. Pleadings in all lawsuits where the Debtor is a party;
46. Arbitration papers and awards where the Debtor is a party;
47. Documents showing ownership of patents;
48. Documents showing ownership of trademarks;
49. Documents showing ownership of copyrights;
50. Documents showing ownership of intellectual property;
51. Any evidence of gifts to others;
52. All cryptocurrency records/statements;
53. Software and hardware wallets;
54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

AO 88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of New York

ALEX HOLMES, ET AL.

Plaintiff

v.

CHET MINING CO, LLC, CHET MINING CO
CANADA LTD and CHET STOJANOVICH

Defendant

Civil Action No. 1:20-CV-0448-UA

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Luca Schnetzler

6721 W Hepburn Way, Los Angeles, CA 90038-3449 or 39 25th Ave Apt. D, Venice, CA 90291-4342

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: [https://us04web.zoom.us/j/72278172346?](https://us04web.zoom.us/j/72278172346?pwd=aTVYTCl6Yk1aeEI4N0xneTFhMFFpQT09)
pwd=aTVYTCl6Yk1aeEI4N0xneTFhMFFpQT09
Meeting ID: 722 7817 2346 Passcode: BfUAe1

Date and Time: Adjourned to
09/16/2021 10:00 am

The deposition will be recorded by this method: Stenographer and video

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit "A" attached hereto. Kindly provide all documents requested, via e-mail to jharwick@joneshacker.com or by U.S. mail to 200 Harborside Drive, Suite 300, Schenectady NY 12305.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/21/2021

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) John F. Harwick,
Representing all Plaintiffs, who issues or requests this subpoena, are:

John F. Harwick, Esq., E. Stewart Jones Hacker Murphy LLP, 200 Harborside Drive, Suite 300, Schenectady NY 12305,
(518) 213-0113 jharwick@joneshacker.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX HOLMES, JOSH NAVARRO, NICO
TRAMONTANA, BITCOIN VENTURES 2020, LLC,
YASAR CORPORATION and ONEPURPOSE LTD.,
Plaintiffs,

RESTRAINING NOTICE

against-

Civil Case No.: 1:20-CV-04448

CHET MINING CO, LLC, CHET MINING CO
CANANDA LTD., and CHET STOJANOVICH,

Defendants.

WHEREAS, no previous restraining notice has been served upon you pursuant to CPLR Article 52.

WHEREAS, it appears that you owe a debt to the plaintiff/judgment creditor or are in possession or in custody of property in which the judgment debtors have an interest.

PLEASE TAKE NOTICE that pursuant to subdivision (b) of Section 5222 of the Civil Practice Law and Rules, which is set forth in full herein, you are hereby forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property or pay over or otherwise dispose of any such debt except as therein provided.

PLEASE TAKE FURTHER NOTICE that this notice also covers all property in which the judgment debtors have an interest hereafter coming into your possession or custody, and all debts hereafter coming due from you to the judgment debtors.

CIVIL PRACTICE LAW AND RULES SECTION 5222(b)

Effect of restraint; prohibition of transfer; duration. A judgment debtor served with a restraining notice is forbidden to make or suffer any sale, assignment, transfer or interference with any property in which he has an interest, except upon direction of the sheriff or pursuant to an order of the court, until the judgment is satisfied or vacated. A restraining notice served upon a person other than the judgment debtor is effective only if, at the time of service, he owes a debt to the judgment debtor or he is in the possession or custody of property in which he knows or has reason to believe the judgment debtor has an interest, or if the judgment creditor has stated in the notice that a specified debt is owed by the person served to the judgment debtor or that the judgment debtor has an interest in specified property in the possession or custody of the person served. All property in which the judgment debtor is known or believed to have an

interest then in and thereafter coming into the possession or custody of such a person, including any specified in the notice, and all debts of such a person, including any specified in the notice, then due and thereafter coming due to the judgment debtor, shall be subject to the notice. Such a person is forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to an order of the court, until the expiration of one year after the notice is served upon him, or until the judgment is satisfied or vacated, whichever event first occurs. A judgment creditor who has specified personal property or debt in a restraining notice shall be liable to the owner of the property or the person to whom the debt is owed, if other than the judgment debtor, for any damage sustained by reason of the restraint. If a garnishee served with a restraining notice withholds the payment of money belonging or owed to the judgment debtor in an amount equal to twice the amount due on the judgment, the restraining notice is not effective as to other property or money.

PLEASE TAKE FURTHER NOTICE disobedience of this Restraining Notice is punishable as a contempt of Court.

E. STEWART JONES HACKER MURPHY LLP

By: s/ John F. Harwick
John F. Harwick, Esq.
Attorney for Plaintiffs/Judgement Creditors
200 Harborside Drive, Suite 300
Schenectady, New York 12305
Tel. No.: (518) 213-0113
jharwick@joneshacker.com

Exhibit A

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11. Financial statements;
12. Deeds to any and all real property owned or controlled;
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14. Appraisals of any real or personal property owned;
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17. Audit reports;
18. UCC filings and financing statutes;
19. Payroll account records;
20. Shareholder agreements;
21. Operating agreements of any LLC owned or operated by Debtors;
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23. Insurance policies;
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36. Loan applications;

37. Mortgages, mortgage statements and applications;
38. Loan and line of credit documents and written statements;
39. A statement of net worth;
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46. Arbitration papers and awards where the Debtor is a party;
47. Documents showing ownership of patents;
48. Documents showing ownership of trademarks;
49. Documents showing ownership of copyrights;
50. Documents showing ownership of intellectual property;
51. Any evidence of gifts to others;
52. All cryptocurrency records/statements;
53. Software and hardware wallets;
54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

AO 88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of New York

ALEX HOLMES, ET AL.

Plaintiff

v.

CHET MINING CO, LLC, CHET MINING CO
CANADA LTD and CHET STOJANOVICH*Defendant*

Civil Action No. 1:20-CV-0448-UA

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Paul John Stojanovich

6345 Balboa Boulevard, Suite 375, Encino CA 91316

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

| | |
|--|--|
| Place: https://us04web.zoom.us/j/72278172346? pwd=aTVYTCl6Yk1aeEI4N0xneTFhMFFpQT09 Meeting ID: 722 7817 2346 Passcode: BfUAe1 | Date and Time: Adjourned to 09/16/2021 10:00 am |
|--|--|

The deposition will be recorded by this method: Stenographer and video

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit "A" attached hereto. Kindly provide all documents requested, via e-mail to jharwick@joneshacker.com or by U.S. mail to 200 Harborside Drive, Suite 300, Schenectady, NY 12305.

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Date: 07/21/2021

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing ~~(name of party)~~ John F. Harwick,
Representing all Plaintiffs _____, who issues or requests this subpoena, are:

John F. Harwick, Esq., E. Stewart Jones Hacker Murphy LLP, 200 Harborside Drive, Suite 300, Schenectady NY 12305,
(518) 213-0113 jharwick@joneshacker.com

Notice to the person who issues or requests this subpoena

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX HOLMES, JOSH NAVARRO, NICO
TRAMONTANA, BITCOIN VENTURES 2020, LLC,
YASAR CORPORATION and ONEPURPOSE LTD.,
Plaintiffs,

RESTRAINING NOTICE

against-

Civil Case No.: 1:20-CV-04448

CHET MINING CO, LLC, CHET MINING CO
CANANDA LTD., and CHET STOJANOVICH,

Defendants.

WHEREAS, no previous restraining notice has been served upon you pursuant to CPLR Article 52.

WHEREAS, it appears that you owe a debt to the plaintiff/judgment creditor or are in possession or in custody of property in which the judgment debtors have an interest.

PLEASE TAKE NOTICE that pursuant to subdivision (b) of Section 5222 of the Civil Practice Law and Rules, which is set forth in full herein, you are hereby forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property or pay over or otherwise dispose of any such debt except as therein provided.

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CIVIL PRACTICE LAW AND RULES SECTION 5222(b)

Effect of restraint; prohibition of transfer; duration. A judgment debtor served with a restraining notice is forbidden to make or suffer any sale, assignment, transfer or interference with any property in which he has an interest, except upon direction of the sheriff or pursuant to an order of the court, until the judgment is satisfied or vacated. A restraining notice served upon a person other than the judgment debtor is effective only if, at the time of service, he owes a debt to the judgment debtor or he is in the possession or custody of property in which he knows or has reason to believe the judgment debtor has an interest, or if the judgment creditor has stated in the notice that a specified debt is owed by the person served to the judgment debtor or that the judgment debtor has an interest in specified property in the possession or custody of the person served. All property in which the judgment debtor is known or believed to have an

interest then in and thereafter coming into the possession or custody of such a person, including any specified in the notice, and all debts of such a person, including any specified in the notice, then due and thereafter coming due to the judgment debtor, shall be subject to the notice. Such a person is forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to an order of the court, until the expiration of one year after the notice is served upon him, or until the judgment is satisfied or vacated, whichever event first occurs. A judgment creditor who has specified personal property or debt in a restraining notice shall be liable to the owner of the property or the person to whom the debt is owed, if other than the judgment debtor, for any damage sustained by reason of the restraint. If a garnishee served with a restraining notice withholds the payment of money belonging or owed to the judgment debtor in an amount equal to twice the amount due on the judgment, the restraining notice is not effective as to other property or money.

PLEASE TAKE FURTHER NOTICE disobedience of this Restraining Notice is punishable as a contempt of Court.

E. STEWART JONES HACKER MURPHY LLP

By: s/ John F. Harwick
John F. Harwick, Esq.
Attorney for Plaintiffs/Judgement Creditors
200 Harborside Drive, Suite 300
Schenectady, New York 12305
Tel. No.: (518) 213-0113
jharwick@joneshacker.com

Exhibit A

Produce the following items relating to Chet Mining Co., LLC, Chet Mining Co Canada

LTD and Chester Stojanovich (collectively the "Debtors") for the past six (6) years:

1. All documents showing loans to others;
2. General ledger and checkbooks;
3. Federal and State Income Tax Returns, including all schedules and amendments;
4. Bank account statements (e.g., cash accounts, checking accounts, savings accounts);
5. Certificates of deposit;
6. Balance sheets;
7. A list of assets and/or inventory owned or leased ;
8. Any documents showing monies owed to the Debtors;
9. A list of all accounts receivable, with the debtor's addresses;
10. Documents showing any transactions with insiders (e.g. employees, shareholders, members, owners, officers or directors of the Debtors);
11. Financial statements;
12. Deeds to any and all real property owned or controlled;
13. Documents showing ownership, leasing or control of any real property, equipment, boat, aircraft or vehicles;
14. Appraisals of any real or personal property owned;
15. Loan and/or line of credit applications;
16. All audited or unaudited financial statements and disclosures;
17. Audit reports;
18. UCC filings and financing statutes;
19. Payroll account records;
20. Shareholder agreements;
21. Operating agreements of any LLC owned or operated by Debtors;
22. LLC or Corporate minutes, books and records;
23. Insurance policies;
24. Titles to any and all vehicles, boats, aircrafts and/or equipment;
25. Wills;
26. Trusts where the Debtors are beneficiaries or grantors;
27. Retirement account statements;
28. Investment accounts statements;
29. Securities certificates;
30. Stock options;
31. Commodity account statements;
32. Broker margin account statements;
33. Written itemization of all cash and crypto currency held by or on behalf of the Debtors;
34. Safe deposit box records and the contents of safe deposit boxes;
35. Credit card statements and applications;
36. Loan applications;

37. Mortgages, mortgage statements and applications;
38. Loan and line of credit documents and written statements;
39. A statement of net worth;
40. Divorce proceeding records;
41. Contingent interests (*e.g.*, stock options, interests subject to life estates, prospective inheritances);
42. Tax shelter investment records;
43. Debt collection records;
44. Judgments;
45. Pleadings in all lawsuits where the Debtor is a party;
46. Arbitration papers and awards where the Debtor is a party;
47. Documents showing ownership of patents;
48. Documents showing ownership of trademarks;
49. Documents showing ownership of copyrights;
50. Documents showing ownership of intellectual property;
51. Any evidence of gifts to others;
52. All cryptocurrency records/statements;
53. Software and hardware wallets;
54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

AO 88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of New York

ALEX HOLMES, ET AL.

Plaintiff

v.

CHET MINING CO, LLC, CHET MINING CO
CANADA LTD and CHET STOJANOVICH

Defendant

Civil Action No. 1 :20-CV-0448-UA

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Sue Elizabeth Nelson
1606 Esplanade, Redondo Beach, CA 90277-5251
(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

| | |
|--|--|
| Place: https://us04web.zoom.us/j/72278172346? pwd=aTVYTCT6Yk1aEi4N0xneTFhMFFpQT09 Meeting ID: 722 7817 2346 Passcode: 8fUAe1 | Date and Time: Adjourned to 09/16/2021 10:00 am |
|--|--|

The deposition will be recorded by this method: Stenographer and video

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit "A" attached hereto. Kindly provide all documents requested, via e-mail to jharwick@joneshacker.com or by U.S. mail to 200 Harborside Drive, Suite 300, Schenectady NY 12305.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/21/2021

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) John F. Harwick, Representing all Plaintiffs, who issues or requests this subpoena, are:

John F. Harwick, Esq., E. Stewart Jones Hacker Murphy LLP, 200 Harborside Drive, Suite 300, Schenectady NY 12305, (518) 213-0113 jharwick@joneshacker.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX HOLMES, JOSH NAVARRO, NICO
TRAMONTANA, BITCOIN VENTURES 2020, LLC,
YASAR CORPORATION and ONEPURPOSE LTD.,
Plaintiffs,

RESTRAINING NOTICE

against-

Civil Case No.: 1:20-CV-04448

CHET MINING CO, LLC, CHET MINING CO
CANANDA LTD., and CHET STOJANOVICH,

Defendants.

WHEREAS, no previous restraining notice has been served upon you pursuant to CPLR Article 52.

WHEREAS, it appears that you owe a debt to the plaintiff/judgment creditor or are in possession or in custody of property in which the judgment debtors have an interest.

PLEASE TAKE NOTICE that pursuant to subdivision (b) of Section 5222 of the Civil Practice Law and Rules, which is set forth in full herein, you are hereby forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property or pay over or otherwise dispose of any such debt except as therein provided.

PLEASE TAKE FURTHER NOTICE that this notice also covers all property in which the judgment debtors have an interest hereafter coming into your possession or custody, and all debts hereafter coming due from you to the judgment debtors.

CIVIL PRACTICE LAW AND RULES SECTION 5222(b)

Effect of restraint; prohibition of transfer; duration. A judgment debtor served with a restraining notice is forbidden to make or suffer any sale, assignment, transfer or interference with any property in which he has an interest, except upon direction of the sheriff or pursuant to an order of the court, until the judgment is satisfied or vacated. A restraining notice served upon a person other than the judgment debtor is effective only if, at the time of service, he owes a debt to the judgment debtor or he is in the possession or custody of property in which he knows or has reason to believe the judgment debtor has an interest, or if the judgment creditor has stated in the notice that a specified debt is owed by the person served to the judgment debtor or that the judgment debtor has an interest in specified property in the possession or custody of the person served. All property in which the judgment debtor is known or believed to have an

interest then in and thereafter coming into the possession or custody of such a person, including any specified in the notice, and all debts of such a person, including any specified in the notice, then due and thereafter coming due to the judgment debtor, shall be subject to the notice. Such a person is forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to an order of the court, until the expiration of one year after the notice is served upon him, or until the judgment is satisfied or vacated, whichever event first occurs. A judgment creditor who has specified personal property or debt in a restraining notice shall be liable to the owner of the property or the person to whom the debt is owed, if other than the judgment debtor, for any damage sustained by reason of the restraint. If a garnishee served with a restraining notice withholds the payment of money belonging or owed to the judgment debtor in an amount equal to twice the amount due on the judgment, the restraining notice is not effective as to other property or money.

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By: s/ John F. Harwick
John F. Harwick, Esq.
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50. Documents showing ownership of intellectual property;
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52. All cryptocurrency records/statements;
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54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT COURT

ALEX HOLMES, et al.,

Plaintiffs,

-against-

AFFIDAVIT OF SERVICE

Case No.: 7:20-cv-0448-UA

CHET MINING CO., LLC, et al.

Defendants.

STATE OF NEW YORK)
)ss:
COUNTY OF SCHENECTADY)

Deanna M. Dudley, being duly sworn, deposes and says that she is over the age of 18 years and is not a party to this action; on the 10th day of August 2021, she served the within **LETTER ENCLOSING SUBPOENAS AND NEW DATE FOR DEPOSITION** upon the following:

TO: CHET STOJANOVICH
105 Duane Street, Apt. 20F
New York, NY 10007
chet@chetminingco.com

by depositing a true and correct copy of the same via e-mail and properly enclosed in a post-paid wrapper in the Post Office maintained and exclusively controlled by the United States at Schenectady, New York directed to said individual and/or attorney(s), respectively, at said address(es), mentioned above, that being the address(es) within the state designated for that purpose upon the last papers served in this action or the place where the above then resided or kept offices, according to the best information which can be conveniently obtained.

Deanna M. Dudley

Sworn to before me this
10th day of August 2021.

Notary Public - State of New York

CATHY L. DROBNY
Notary Public, State of New York
Not. # 080091977
Qualified in Saratoga County
Commission Expires 10/23/21